

1 Honorable James L. Robart
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7 UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 NATIONAL PRODUCTS, INC.,

11 Civil Case No. CV08-0049-JLR

12 v. Plaintiff,

13 GAMBER-JOHNSON LLC,

14 Defendant.

15 **STIPULATED MOTION TO SEAL**
PLAINTIFF'S MOTION FOR
LEAVE TO SUPPLEMENT
EVIDENCE IN OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT AND
CERTAIN EXHIBITS TO THE
SUPPLEMENTAL DECLARATION
OF MARK P. WALTERS

16 **Note on Motion Calendar:**
17 **Tues., January 26, 2010**

18 Plaintiff, National Products, Inc. ("NPI"), through its counsel of record hereby
19 moves for an order sealing Plaintiff's Motion for Leave to Supplement Evidence In
20 Opposition to Defendant's Motion for Summary Judgment and Exhibits B and C to the
21 [Proposed] Supplemental Declaration of Mark P. Walters in Opposition to Defendant's
22 Motion for Summary Judgment. A compelling reason exists for sealing certain information
23 contained in these documents, said information including customer names and other
24 confidential information of third party witness General Dynamics/Itronix ("GDI"). As
explained in the accompanying Declaration of Mark P. Walters In Support of Plaintiff's
Motion to Seal, GDI maintains this information in confidence as a trade secret. GDI's trade

1 secret right in its customer names and other information outweighs the public's need
2 to know this information for the purposes of the Court's consideration of Defendant, Gamber
3 Johnson LLC's ("Gamber"), Motion for Summary Judgment (Docket No. 85). NPI has met
4 and conferred with Defendant Gamber-Johnson LLC, who has indicated through counsel
5 that there is no opposition to the Court's entry of an order sealing the above identified
6 documents.

7 Dated: January 26, 2010
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9 By:s/ Mark P. Walters

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14 *Attorneys for Plaintiff National Products,
15 Inc.*

16 *Attorneys for Defendant Gamber-Johnson*

CERTIFICATE OF SERVICE

I, Marlon R. Muñoz, hereby certify that on January 26, 2010, I caused the foregoing to **STIPULATED MOTION TO SEAL PLAINTIFF'S MOTION FOR LEAVE TO SUPPLEMENT EVIDENCE IN OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND CERTAIN EXHIBITS TO THE SUPPLEMENTAL DECLARATION OF MARK P. WALTERS** be served on the following parties as indicated below:

<p>Mark S. Parris ORRICK HERRINGTON & SUTCLIFFE LLP 701 Fifth Avenue, Ste. 5700 Seattle, WA 98104-7097</p> <p><i>Attorneys for Defendant Gamber-Johnson LLC</i></p>	<p>[] By United States Mail [] By Legal Messenger [X] By Electronic CM/ECF [] By Overnight Express Mail [] By Facsimile [] By Email [by agreement of counsel] mparris@orrick.com</p>
<p>Jonathan D. Jay Nicholas S. Kuhlmann Terrance C. Newby LEFFERT JAY & POLGLAZE, P.A. 150 South Fifth Street, Suite 1900 Minneapolis, MN 55402</p> <p><i>Attorneys for Defendant Gamber-Johnson LLC</i></p>	<p>[] By United States Mail [] By Legal Messenger [X] By Electronic CM/ECF [] By Overnight Express Mail [] By Facsimile [] By Email [by agreement of counsel] jjay@ljp-iplaw.com nkuhlmann@ljp-iplaw.com tnewby@ljp-iplaw.com</p>
<p>Michael A. Doornweerd JENNER & BLOCK LLP 353 N. Clark Street Chicago, IL 60654-3456</p> <p><i>Attorneys for Third Party General Dynamics/Itronix</i></p>	<p>[X] By United States Mail [] By Legal Messenger [] By Electronic CM/ECF [] By Overnight Express Mail [] By Facsimile [X] By Email [by agreement of counsel] MDoornweerd@jenner.com</p>

DATED: January 26, 2010

s/ Marlon R. Muñoz
for David K. Tellekson, WSBA No. 33523
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STIPULATED MOTION TO SEAL
Civil Case No. CV08-0049-JLR

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